

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

ALD SOCIAL LLC,	§
	§
Plaintiff,	§ Civil Action No. 6:22-cv-00975-FB
v.	§ <b>JURY TRIAL DEMANDED</b>
VERKADA INC.,	§
	§
Defendant.	§
	§
	§
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	§

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**JOINT STIPULATION TO TRANSFER CASE TO  
THE NORTHERN DISTRICT OF CALIFORNIA  
UNDER 28 U.S.C. § 1404(A)**

Plaintiff ALD Social LLC (“ALD Social”) and Defendant Verkada Inc. (“Verkada”) (collectively, the “Parties”) hereby stipulate and agree that:

WHEREAS, the above-captioned action is presently pending before Judge Fred Biery in the Western District of Texas, Waco Division;

WHEREAS, on November 25, 2022, Verkada filed a motion to transfer the above-captioned case to the Northern District of California under 28 U.S.C. § 1404(a) for convenience of the parties and witnesses (Dkt. 13);

WHEREAS, Verkada’s motion and the accompanying Declaration of Derville Lannon (Dkt. 13-1) demonstrate that the Northern District of California is clearly a more convenient forum for the above-captioned action than the Western District of Texas;

WHEREAS, the above-captioned action might have been brought in the Northern District

of California;

WHEREAS, the Parties have agreed that the above-captioned action should be transferred to the Northern District of California;

NOW, THEREFORE, the Parties hereby agree as follows:

1. The Parties consent to transfer the above-captioned action to the Northern District of California.

2. Transfer of the above-captioned action to the Northern District of California under 28 U.S.C. § 1404(a) will serve the interest of justice and the convenience of the Parties and witnesses.

Dated: January 4, 2023

/s/ William P. Ramey, III

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*Attorneys for Defendant Verkada, Inc.*

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on January 4, 2023, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

*Ricardo G. Cedillo*  
RICARDO G. CEDILLO